

## REMARKS

Claims 1-23 were pending in the application. The Examiner has rejected all of the pending claims under 35 USC 103 as unpatentable over Hori in view of Camut. By this Amendment, Applicants have amended Claims 1 and 11 and have canceled Claims 2 and 12. For the reasons set forth below, Applicants believe that the remaining claims, Claims 1, 3-11, and 13-23 are allowable over the cited art.

The Examiner has stated that the claims are rejected as unpatentable over Hori in view of Camut, although all of the claims rejections appear to use Camut as the primary reference and Hori as the secondary reference. Applicants request clarification of the rejections; but, will address the Examiner's remarks as understood.

The present application is directed to a method, system, article of manufacture, program storage device, and program product for information processing comprising providing an annotation for multiple page files. The method for providing the annotation includes the steps of obtaining a plurality of page files from a web site; generating a group of the page files which have similar page layout structures, providing a first annotation for an arbitrary page file in the group; and correlating the first annotation

with at least a part of other page files of the group. The step of generating the group comprises the steps of analyzing the page files to introduce structural descriptive forms for the page layout structures and characteristic values for the structural descriptive forms; using the structural descriptive forms and the characteristic values to calculate an inter-page distance representing a similarity of the page files; and grouping the page files, of which the inter-page distance is equal to or smaller than a predetermined value. Applicants respectfully assert that the cited art does not teach or suggest the invention as claimed.

The Camut patent is directed to testing or validating transcoded content which has been transcoded by a proxy. Camut simulates requests, sends them through the transcoding proxy, and then compares the transcoded results with predetermined correct results. As taught at Col. 5, lines 64-66, in Camut, a "request 15 passes through a transcoding proxy 30 and is modified by the transcoding proxy 30 as would be understood by one of skill in the art." Camut does not teach or suggest how to transcode requests. Camut further states, at Col. 6, lines 46-47 that "[e]ach received HTTP response is compared with an expected HTTP response (Block 130, Fig. 2)." However, Camut does not teach or

suggest how its system arrives at an "expected HTTP response."

Since Camut does not teach or suggest how a transcoding proxy transcodes requests and does not teach or suggest how the system determines what is an expected response, Applicants respectfully assert that the Camut patent does not anticipate or obviate the claimed steps, and means for performing those steps, of generating a group of page files, page layout structures of which are at least similar, by analyzing the page files to introduce structural descriptive forms for the page layout structures and characteristic values for the structural descriptive forms; employing the structural descriptive forms and the characteristic values to calculate an inter-page distance representing a similarity of the page files; and grouping the page files, of which the inter-page distance is equal to or smaller than a predetermined value. Camut does not teach or suggest that the transcoding proxy analyzes the page files. Nor does Camut teach or suggest that the system analyzes page files to create "expected HTTP responses". Camut does not provide for the system or the transcoding proxy to introduce structural descriptive forms for the page layout structures and characteristic values for the structural descriptive forms. Applicants respectfully assert that the cited

teachings from Col. 7, lines 18-21 and Col. 8, lines 33-36 simply state that all pages of a Web site can be tailored by the transcoding proxy to be displayed on a device of a different size. Camut simply provides no details as to how this tailoring is accomplished. Applicants conclude, therefore, that the Camut patent does not disclose the inventive steps or means for generating groups of page files as claimed.

Applicants further assert that Camut does not teach or suggest the steps of providing a first annotation for an arbitrary page file in the group and correlating the first annotation with at least a part of other page files of the group. The Examiner has acknowledged that Camut does not "mention the content in an annotation". Applicants respectfully assert that the claim language does not include any recitation of the content in an annotation. Moreover, Applicants disagree that the Hori reference provides those teachings which are missing from the Camut patent. The Examiner cites Hori because "Hori mention that annotations are transcoded" (*sic*). Applicants again note that the claim language does not recite transcoding of page files nor of annotations. Rather, the claims recite annotating an arbitrary page file in a group generated in accordance with

the recited steps and correlating the annotation with at least part of other page files in the group.

It is well established under U.S. Patent Law that, to establish a *prima facie* case of obviousness, the Examiner must provide references which teach or suggest all of the claim features (*In re Wilson*, 424 F. 2d 1382, 1385, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970)). Since neither Camut nor Hori teaches or suggests the steps of generating a group of page files by analyzing the page files to introduce structural descriptive forms for the page layout structures and characteristic values for the structural descriptive forms and then employing the forms and values to calculate interpage distances representing similarity and group according to the interpage distances, and since neither teaches annotating a page file in the so-generated group and correlating the first annotation with at least part of other page files in the group, it cannot be maintained that the claims are obvious over the cited art.

Applicants also conclude that, if one were to modify Camut with Hori, one would arrive at a system wherein requests for annotated Web pages would be simulated, the retrieved annotated pages would be transcoded, and the transcoded pages would be compared to expected HTTP responses. Under a Camut/Hori system, no page groups would

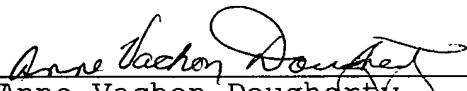
be generated and any annotation would be done before retrieving pages, not after analyzing obtained page files and generating groups therefore. Clearly, one would not arrive at the invention as claimed.

Based on the foregoing amendments and remarks, Applicants request entry of the amendments, withdrawal of the rejections, and issuance of the claims.

Respectfully submitted,

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